

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF WEST VIRGINIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUIONTE CRAWFORD,

Defendant.

Criminal No. 1:19CR35

JUDGE KLEEH

**UNITED STATES' MOTION
FOR EXTENSION OF TIME**

Now comes the United States of America by William Ihlenfeld, United States Attorney for the Northern District of West Virginia, and David J. Perri, Assistant United States Attorney, and respectfully requests an extension of the amount of time allotted to respond to the Defendant's "Supplement to Mr. Crawford's Pro Se Petition to Vacate, Set Aside, or Correct a Sentence by a Person in Federal Custody Pursuant to 28 U.S.C. § 2255." [Document No. 52]

MEMORANDUM

- 1) On May 12, 2022, the Defense Counsel filed a twenty-one page Supplement to the defendant's original pro se § 2255 motion. [Document No. 52]
- 2) The Court ordered that the United States' response be filed on or before June 10, 2022. [Document No. 51]
- 3) The Undersigned Counsel for the United States has been doing an unusual amount of traveling and is presently working on an unusually difficult appellate brief which is taking up a significant amount of time.

- 4) Under the circumstances, the United States foresees that it will need an extension of (30) thirty days of the time allotted for the completion of a Response.
- 5) The Undersigned Counsel has consulted with Defense Counsel, Richard Walker, and he has no objection to the extension.

WHEREFORE, the United States respectfully requests an extension of (30) thirty days.

Respectfully submitted,

WILLIAM IHLENFELD
UNITED STATES ATTORNEY

By: /s/ David J. Perri
David J. Perri
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CERTIFICATE OF SERVICE

I, David J. Perri, Assistant United States Attorney for the Northern District of West Virginia, hereby certify that the foregoing UNITED STATES RESPONSE TO DEFENDANT'S SUPPLEMENT TO MR. CRAWFORD'S PRO SE PETITION TO VACATE, SET ASIDE, OR CORRECT A SENTENCE BY A PERSON IN FEDERAL CUSTODY PURSUANT TO 28 U.S.C. § 2255 electronically filed with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to the following:

Richard Walker, Esq.
2330 West Pike St., Ste.360
Clarksburg, WV 26302

Dated: June 9, 2022.

By: /s/ David J. Perri
David J. Perri
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